

Please give strong consideration to adopting RM-10352. With the spread of low cost HF transmitting equipment around the world, and the diminishing commercial requirements for CW operation, the U.S. needs to establish a standard regarding the preservation of CW band segments. All the HF bands except 160 meters have established CW sub-bands. The original justification for an unpartitioned band probably related to the band's genesis as a shared allocation with LORAN and other users, low power requirements for amateur use, and the general experimental nature of the band. In the past ten years or so, 160 meters has become a very popular band for hams worldwide, and interference to weak signal work from telephony transmission has been growing each year. This week, during a particular good opening to Europe and West Asia, there were two South American stations operating phone on 1830 and 1840 KHz, bracketing the weak signal portion of the band where the distant stations were operating. No one expects the FCC to regulate South American amateurs, but we need to set the example for the rest of the world's amateurs. This week's experience is just a portent of things to come on Top Band, as more and more people take to the air, and find that, unlike other bands which have intelligent band plans that set aside CW allocations, this one is an apparent "free for all." Simply put, act now to bring this band into alignment with our other ham bands, preserving the essential cw operation and weak signal capabilities that keep the leading edge of amateur radio achievement in the forefront.